

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

IN RE:  
ALICE JEAN VASKO, Debtor.

CASE NO.: 17-10074-KHK  
Chapter 13

NOTICE

PLEASE TAKE NOTICE THAT SCOTT H. DONOVAN, Counsel for Debtor, has filed papers with the Court to Object to Proof of Claim #4 .

Your rights may be affected. You should read these papers carefully and discuss them with your Attorney, if you have one in this bankruptcy case. (If you do not have an Attorney, you may wish to consult one.)

If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then on or before fifteen days from the date of this Notice, you or your Attorney must:

File with the Court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the Court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
200 South Washington Street  
Alexandria, VA 22314

You must also mail a copy to:

Thomas Gorman, Trustee  
300 N Washington St #400  
Alexandria, VA 22314

Scott H. Donovan, Esquire  
Attorney for Debtor  
9402 Grant Avenue  
Manassas, VA 20110

Attend the hearing on the Motion scheduled to be held on JUNE 1, 2017 at 1:30 p.m. at United States Bankruptcy Court, 200 South Washington Street, 2<sup>nd</sup> Floor, Courtroom II, Alexandria, VA 22314.

If you or your Attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion or Objection and may enter an Order granting that relief.

ALICE JEAN VASKO,  
By Counsel

SCOTT H. DONOVAN, P.C.

/s/Scott H. Donovan  
SCOTT H. DONOVAN, ESQUIRE  
VSB #24592  
Counsel for Debtor  
9402 GRANT AVENUE  
MANASSAS, VIRGINIA 20110  
(703) 257-1159/ScottHDonovan@aol.com

CERTIFICATE OF SERVICE

I hereby certify that on the 17<sup>th</sup> day of April, 2017, copies of the foregoing were electronically delivered to Thomas Gorman, Chapter 13 Trustee, US Trustee, Debtor and mailed by USPS Certified Return Receipt requested to Judith Spagnuolo, Chairman of General Municipal Authority of the Borough of Harveys Lake at 138 South Main Street, Wilkes-Barre, PA 18703.

/s/Scott H. Donovan  
Scott H. Donovan, Esquire

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

IN RE:  
ALICE JEAN VASKO, Debtor.

CASE NO.: 16-14014-KHK  
Chapter 13

OBJECTION TO PROOF OF CLAIM #4

COMES NOW, Debtor, ALICE JEAN VASKO, by Counsel and moves this honorable Court and objects to Proof of Claim #4 filed by General Municipal Authority of the Borough of Harveys Lake (hereinafter "BORO") for Municipal Sewage Fees Charged and states as follows:

1. This Objection arises in and relates to Debtor's Chapter 13 Bankruptcy case now pending in this Court.
2. That on or about April 6, 2017, BORO filed Proof of Claim #4 for a secured claim claim in the amount of \$28,534.72, plus interest at the rate of 6%.
3. The Debtor does object to Proof of Claim #4 to the extent that BORO claims lawful sewer charges, interest, Penalties, Sheriff's Sale Costs and Poundage Deposit, Costs of Suit, Legal fees and any post-petition charges as well.
4. That the Debtor has never been served with Notice of the Assessment of any of the foregoing charges as required.
5. That the alleged aforementioned charges are unlawful, not due at this time and/or are unreasonable and excessive, and not secured to the Real Estate as alleged.
6. The Debtor requests that the Proof of Claim filed by BORO be disallowed.

WHEREFORE, the Debtor respectfully requests that:

- a) Proof of Claim #4 filed by BORO be disallowed, all or in part, and;
- b) For such other and further relief as this Honorable Court deems just and proper under the law.

ALICE JEAN VASKO,  
By Counsel

SCOTT H. DONOVAN, P.C.

/s/Scott H. Donovan

SCOTT H. DONOVAN, ESQUIRE VSB #24592  
9402 GRANT AVENUE  
MANASSAS, VIRGINIA 20110  
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/s/Scott H. Donovan  
Scott H. Donovan, Esquire